THE HONORABLE MARC L. BARRECA
Hearing Date: January 20, 2011
Hearing Time: 9:30 a.m.
Response Date: January 13, 2011
Hearing Location: Seattle
Chapter 7

THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM GROSSMAN, Debtor.	Case No. 10-19817 MOTION FOR ABANDONMENT

COMES NOW the Debtor, by and through his attorney of record Jeffrey B. Wells, and moves the court for an abandonment by the estate of Terrington Davies LLC, a Delaware Limited Liability Company (the "Advisor"). As more fully set forth in the declaration of the Debtor, Adam Grossman, the Advisor served as the general partner to the Terrington Davies Tanager Fund LP, a Delaware Limited Partnership (the "Fund").

The Advisor was controlled and operated by the Debtor, Adam Grossman, and his partner Jeffery Bernstein who is an attorney. The Fund was filed with the SEC and operated under SEC Reg D, §S504, §505, §506. The Fund held funds deposited various clients and primarily traded SEC regulated broad-based equity index options on the Chicago Board Options Exchange (CBOE). In 2010, the last year of active trading operations, the Fund traded derivatives having an aggregate total nominal underlying value of approximately three hundred

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million dollars ($300,000,000.00).

Adam Grossman has a fiduciary duty to the investors, which includes the preparation of K-1's for the 2010 tax year. It is estimated that the cost of preparing those K-1's for the investors will be approximately $24,000. The source of those funds is not currently known but can probably be raised through a combination of sources such as Mr. Bernstein or major investors wishing to receive their K-1's and willing to lend funds required by accountants. It is the Debtor's understanding that the Trustee does not wish to incur the trouble or the expense of having those K-1's prepared by the estate.

The Advisor has no (material) assets of its own because retained earnings consisting of fees paid monthly by the Fund less expected near term costs were generally distributed to the Managing Members of the Advisor, Adam Grossman and Jeffery Bernstein.

The sole asset of the Advisor is a single brokerage account, functioning primarily as a bank account, having a small amount of money -- likely measured in the hundreds of dollars or even less if payments were made to the accountants for past due fees for the preparation of 2009 tax returns and K-1's.

As such, the motion for abandonment is merely a motion to relieve the bankruptcy estate of a burden with no corresponding diminution in assets. To the contrary, it may remove possible liabilities to the estate which could include (a) potential funds needed and raised through capital calls from its owner to file a 2010 tax return and corresponding K-1's; and (b) potential legal liability related to the lack of filing a tax return or sending K-1's to investors.

This motion is timely because completing a 2010 tax return and sending 2010 K-1's prior to 2012 could have benefit (or lack of liability) to the Fund, the Advisor, and this benefit (or lack of liability) could flow through to the Debtor.

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This motion in no way interferes or is connected to the Trustee's adversary complaint filed under cause no. 11-01954 to recover property for the estate. The Debtor supports the Trustee's efforts to gain control of the assets of the estate and maximize the value of the estate. The present motion claims no interest in that adversary complaint.

The Debtor's proposed order of abandonment makes clear that the abandonment does not affect the Trustee's adversary complaint or attempts to recover the property for the benefit of creditors and investors having claims on the estate.

Dated this 15th day of December, 2011.

_/s/ *Jeffrey B. Wells, WSBA #6317*_____________
Jeffrey B. Wells, WSBA #6317
Attorney for Debtor

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THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM GROSSMAN, Debtor.	Case No. 10-19817 NOTICE OF HEARING ON MOTION FOR ABANDONMENT

PLEASE TAKE NOTICE that the hearing on the **Motion for Abandonment** IS SET FOR HEARING AS FOLLOWS:

JUDGE: Marc L. Barreca TIME: 9:30 a.m.

PLACE: U.S. Bankruptcy Court
700 Stewart St. Rm 7106
Seattle, WA 98101
DATE: January 20, 2011

IF YOU OPPOSE the Motion, you must file your written response with the court clerk, serve two copies to the Judge's chambers and deliver copies on the undersigned and the Chapter 11 Trustee NOT LATER THAN the RESPONSE DATE, which is January 13, 2011.

IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion, GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and strike the hearing.

DATED this 15th of December, 2011.

/s/ *Jeffrey B. Wells*
Jeffrey B. Wells, WSBA #6317
Attorney for the Debtor

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THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM GROSSMAN, Debtor.	Case No. 10-19817 ORDER AUTHORIZING ABANDONMENT - ***PROPOSED -***

THIS MATTER having come on regularly before the above-signed Judge of the above-entitled Court upon the motion of the Debtor to have the estate abandon its interest in Terrington Davies LLC, and notice having been given to all creditors and parties in interest, and no opposition to said motion having been filed; Now, Therefore,

IT IS HEREBY ORDERED that Debtorsô motion to abandon the estateôs interest in Terrington Davies, LLC be and hereby is granted and the estateôs interest in Terrington Davies, LLC is abandoned to the Debtor. The abandonment does not affect the Trusteeôs adversary complaint under cause number 11-01954 and attempts to recover the property for the benefit of investors and the estate by the Trustee.

/// End of Order ///

Presented by:

/s/ Jeffrey B. Wells
Jeffrey B. Wells, WSBA #6317
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